

E-filed 3/23/06

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7

8 IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
9 SAN JOSE DIVISION

10 UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
11 Plaintiff,)	
)	
12 v.)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS DATE
13 JOHN WHITE,)	
)	
14 Defendant.)	
15 _____)	

16 Assistant United States Attorney Carlos Singh and defendant, John White, through his
17 counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status
18 date in the above-captioned matter, presently scheduled for March 22, 2006, at 9:00 a.m., should
19 be continued to May 3, 2006 at 9:00 a.m.

20 Mr. White was arraigned on February 28, 2006. At the arraignment, the parties agreed to
21 set this case on the Court's March 22, 2006 calendar. The parties stipulate and agree that this
22 status date should be continued because counsel for the government recently provided the
23 defense with discovery, and counsel needs additional time to review the discovery, discuss it with
24 her client and to investigate this case. For these reasons, the parties stipulate and agree to
25 continue the status date to May 3, 2006.

26 The parties further stipulate and agree that under 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv),
the ends of justice served by the continuance requested outweigh the best interest of the

1 defendant and public in a speedy trial because the failure to grant such a continuance would
2 unreasonably deny Mr. White the time necessary for effective preparation, taking into account
3 the exercise of due diligence.

4
5 SO STIPULATED.

6
7 Dated: March 21, 2006

/s/

ANGELA M. HANSEN
Assistant Federal Public Defender

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9
10 Dated: March 21, 2006

/s/

CARLOS SINGH
Assistant United States Attorney

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
Plaintiff,)	[PROPOSED] ORDER CONTINUING
)	STATUS DATE AND EXCLUDING
v.)	TIME
)	
JOHN WHITE,)	
)	
Defendant.)	
_____)	

The parties have jointly requested to continue the status date and good cause appearing, IT IS HEREBY ORDERED that the status date presently set for March 22, 2006 at 9:00 a.m. is continued to May 3, 2006 at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from March 22, 2006 through and including May 3, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: March 23 2006


JEREMY FOGEL
United States District Judge

1 Distribute to:

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